

William Delgado

From: William Delgado
Sent: Thursday, December 17, 2009 11:02 AM
To: enrico.schaefer@traverselegal.com; 'Cathy Dittrich'
Subject: RE: Joint Planning Conference Report
Attachments: image001.gif; image003.jpg

Enrico,

I need to confer with my client to discuss the deadlines but, unfortunately, he is out of the country until Tuesday. I will speak to him on Tuesday morning and get back to you as soon as possible thereafter.

Will

From: Enrico Schaefer [mailto:enrico@traverselegal.com]
Sent: Wednesday, December 16, 2009 11:55 AM
To: William Delgado; 'Cathy Dittrich'
Subject: Joint Planning Conference Report

William:

Find attached a proposed Joint Conference Report consistent with our conference yesterday. I have also attached a .pdf version with my thoughts and explanations. Finally, I will have Cathy from my office send you previous orders entered by our Judge for your review. Our Order is consistent with the approach in this previous case, although the discovery period we propose and related dates are longer.

If you agree with our proposed dates, let me know. If you have counter-proposals, let me know as well. Recall that we can avoid the hearing on Jan 11 if we can reach agreement on this report.

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